

FILED

United States District Court for Northern District of Ohio
MDL Docket No. 2196 Index No. 10-MD-2196 (JZ)

2014 JAN 13 AM 11:48

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

David Carson, Defendant answers to complaint Ford Motor Company Plaintiff filed U.S. District Court for the Eastern District of Michigan civil action No. 13-14570 transferred to U.S. District Court for the Northern District of Ohio to be consolidated for pretrial purposes with MDL No. 2196 on Dec. 3, 2013

1. Denied. Never sold polyurethane foam to the Plaintiff and or others in the U.S.A.
2. Denied. Scottdel Inc didn't manufacture flexible polyurethane foam only manufactured recycled bonded carpet cushion and sold most of it within a 250 mile radius of its only plant in Swanton, OH.
3. through 37. Denied. No knowledge.

38. True. Except last sentence Scottdel Inc didn't make or sell polyurethane foam and didn't ship throughout the United States.

39. False. Louis Carson is a US citizen but lived in Toledo Oh and didn't become President of Scottdel Inc until November of 2003 and Scottdel never sold polyurethane foam throughout the U.S. only sold recycled bonded carpet cushion in the Midwest and most within a 250 mile radius of Swanton, OH.

40. False. David Carson is a US citizen and I was only temporary manufacturing manager of Scottdel after Jeff Carter left Scottdel until they found a replacement for Jeff as I didn't have any manufacturing experience and never in the time I worked for Scottdel did I have the responsibilities for setting prices.

41. True

42. Denied. Scottdel Inc never manufactured or sold polyurethane foam during the conspiracy period, and if Scottdel Inc, Dad and I benefited so much from high profits why did the bank place Scottdel in receivership and why is Dad living in Ohio on social security and I'm working in Florida at a Golf Club trying to make ends meet.

43. through 126 L. Denied. No knowledge.

126 m. First two sentences no knowledge. Last two sentences. True
126 n. through 183. Denied. No Knowledge.

I David Carson deny and have no knowledge of any and all allegations in this complaint and all other matters concerning price fixing of flexible polyurethane foam or recycled bonded carpet cushion.

Respectfully Submitted


David Carson

UNITED STATES DISTRICT COURT

for the
Eastern District of Michigan

Ford Motor Company, et al,

Plaintiff,

v.

Carpenter Company, et al

Defendant.

Civil Action No. 13-14570

Hon. Sean F. Cox

SUMMONS IN A CIVIL ACTION

To: David Carson

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Eric J. Pelton
Kienbaum, Oppenwall,
280 N. Old Woodward Avenue
Suite 400
Birmingham, MI 48009-6255
248-645-0000

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

DAVID J. WEAVER, CLERK OF COURT

By: s/ T McGovern

Signature of Clerk or Deputy Clerk

Date of Issuance: November 4, 2013

